

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-293-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;	)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,	)	
INC.; SAMSUNG SEMICONDUCTOR	)	
INC.,	)	
	)	
Defendants.	)	

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NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-294-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;	)	
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF**  
**NETLIST INC.'S OPPOSITION TO MICRON'S DAUBERT MOTION**  
**AND MOTION TO STRIKE EXPERT TESTIMONY OF PETER**  
**GILLINGHAM (DKT. 368)**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Micron’s Daubert Motion and Motion to Strike Expert Testimony of Peter Gillingham (Dkt. 368). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of John B. Halbert, dated November 20, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the Rebuttal Expert Report of Peter Gillingham, dated December 21, 2023.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the Deposition Transcript of Peter Gillingham, dated January 11, 2024.

5. Attached as **Exhibit 4** is a true and correct copy of email correspondence from Micron’s counsel (Mr. Matt McCullough) and Netlist’s counsel (Yanan Zhao) between October 31, 2023 and November 2, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the Deposition Transcript of John Bentley Halbert III, dated September 30, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of the Rebuttal Expert Report of Matthew R. Lynde, Ph.D., dated December 21, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of the Expert Report of Dr. Harold Stone Regarding Issues Related To and Non-Infringement of U.S. Patent Nos. 7,619,912 and 11,093,417, dated December 21, 2023.

9. Attached as **Exhibit 8** is a true and correct letter for document production sent

by Netlist's counsel to Micron's counsel on June 23, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024, in Marshall, Texas.

By /s/ Jason G. Sheasby  
Jason G. Sheasby